



# STORM EVENTS

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ITD Quarterly Storm Water Newsletter

WINTER 2007

*Promoting Responsible Storm Water Management Practices throughout the Idaho Transportation Department*

## Top 7 Storm Water Management Issues on ITD Project Sites

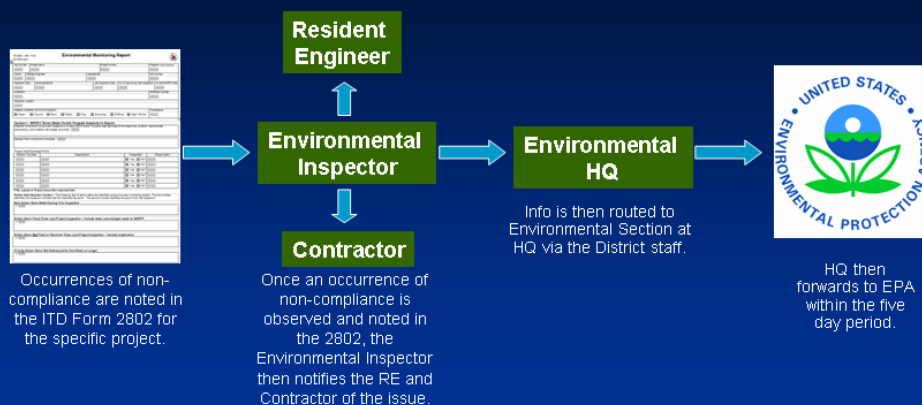
(Boise, ID – December, 2007) The Environmental Section at ITD Headquarters has been tracking storm water management trends on ITD project sites throughout the state. The following provides a summary of storm water management issues and potential solutions.

- 1. Violations Reporting.** Per the Consent Decree (Para 15), ITD shall provide a written report of each known violation of any of the terms of the Decree by ITD or its Contractors to EPA within five days. Please refer to the graphic below for proper reporting procedures.
- 2. Untrained Environmental Inspectors.** Ensure Inspectors attend 24-hour training course conducted by ITD training staff prior to conducting inspections. Inspectors must maintain training certification (every 2 years). Contact Bill Nance for course information.
- 3. Improperly signed Inspection Reports.** Per current ITD guidance, the ADE is the last person in the organizational structure designated as a "corporate officer" per the CGP Appendix G.11.A and B. Accordingly, an ADE or higher must sign and certify all weekly inspection reports. The WPCM must sign each ITD inspection report. If the WPCM is designated as the "Duly Authorized" person to sign storm water management documents, then he or she can also sign for the Prime Contractor. If not, a Corporate Officer of the Prime Contractor must sign the inspection form as well. This process may be revisited in the future but this is the current signature process.
- 4. Lack of Third-Party Inspections.** Per the Consent Decree (Para 9), a Third-Party inspector shall be retained on projects that disturb more than 5 acres and are located in Environmentally Sensitive Areas. ITD maintains a master list of pre-qualified third-party inspectors for each District. For any projects requiring Third-Party Inspections, refer to the master list. We would suggest hiring the Third Party prior to start of construction so they can assist with NOI, SWPPP review, and setting up project correctly.
- 5. Time between inspection reports greater than 7 days.** Conduct inspections on the same day each week and preferably early in the week. Conducting inspections same day forms habits and conducting early in the week gives ITD and Contractor time to fix issues. Also, inspections done Monday or Tuesday allow for discussion of storm water issues at weekly construction meeting.
- 6. Compliance Box unchecked.** Per the CGP 3.10.G, "Where a report does not identify any incidents of non-compliance, the report must contain a certification that the construction project or site is in compliance with the SWPPP and this permit." Be certain to check the "Compliance Box" on each 2802 as appropriate.
- 7. Action Items unresolved.** The Responsible Contractor and ITD shall correct all deficiencies identified during the inspection as soon as possible and no later than five days after the inspection or prior to the next rain event, whichever is sooner. Utilize effective tracking system for Action Items. Number action by source, inspection report, and action item number, e.g., ITD 21-3 would translate to an Action from the ITD inspection #21, the third action item. When writing the next inspection report, copy the Action Items from the previous report into the new report and be sure to address each.

### Test Your Storm Water Management I.Q.:

1. What section of the Construction General Permit (CGP) explains signatory requirements?
2. True or False: Silt fence can be used to re-route flows around a site.
3. Per the Consent Decree, how long must all storm water management records be kept in ITD files.
4. True or False. A damaged fiber wattle that has not resulted in a pollutant release and is repaired within the requisite 5 days after it was noted on an inspection form is a violation of the CGP.

### ITD Violations Reporting Process



**RE and Contractor shall develop potential solutions so that the issue of non-compliance is addressed within the requisite five day period after discovery.**

## BMP of the Quarter



## BMP-2.2 FUGITIVE DUST CONTROL

**Application.** Fugitive dust is primarily produced by traveling vehicles and construction machinery, but may also include blowing wind. The BMP Fugitive Dust Control section shall be used to prevent or reduce fugitive dust situations which include protecting the soil surface, roughening the surface, or reducing the wind velocity at the surface. The primary dust control practices include temporary surface/soil stabilization, dust oil, black liquor (lignin), and magnesium chloride solution or other commercially approved products, temporary vegetation (seeding), water, gravel or rock, surface roughening, and barriers. The time and extent of dust control varies greatly and depends on the season, site characteristics and area within the state. Dust abatement should be a consideration in the initial application. Clearing and grading activities create disturbed areas, which may require dust control measures. Materials or topsoil stockpiles may also require some form of protection from wind, especially in open, arid or semi-arid regions of the state. As a standard practice, all exposed areas should be stabilized. Surface erosion control measures for storm water runoff can also prevent erosion due to wind.

**Limitations.** Water for dust abatement is very effective temporarily, but is quite costly long-term. Barriers, such as fences, may require removal and replacement several times during a construction project and may not be effective. Chemicals such as black liquor or magnesium chloride and oils sold for dust control may be detrimental to adjacent vegetation and soils for revegetative purposes, and may adversely affect surface water runoff. Temporary vegetation (seeding) alone is not practical in arid or semi-arid areas of the state unless establishment water is used. Temporary vegetation should only be considered in combination with other dust abatement measures.

**Refer to: ITD Standard Specifications, Sections 104.05, 104.06, 106.10, and 205.03.**

## ITD STORM WATER FREQUENTLY ASKED QUESTIONS (FAQs)

**Q1:** If ITD has coverage under the Construction General Permit, does this cover storm water requirements for all other storm water management permits that might be applicable to a project site?

**A1:** No. The CGP covers very specific portions of storm water management on a construction site. The other two types of storm water permits, the Multi-Sector General Permit (MSGP) and the Municipal Separate Storm Sewer System (MS4) Permit may have requirements that add to the requirements of the CGP. For example, if the gravel source for a project is a gravel pit that supports multiple projects, then the Contractor and/or ITD would be required to have coverage for that gravel pit under the MSGP. If ITD is performing work within a designated MS4 city, the City may have construction requirements that add to the requirements of CGP.

**Q2:** Per the CGP Section 3.10.A, the Permittee is given the option of performing inspections once every seven days or once every 14 days and within 24 hours of the end of a storm event. Why does ITD have to perform storm water inspections once every seven days?

**A2:** ITD's Specifications Section 212.03 requires that ITD perform storm water management inspections on a weekly basis. Since ITD's organizational specification is more stringent than the CGP, the organizational requirement supersedes the CGP.

**Q3:** I've heard that EPA is developing a new CGP that will supersede the current CGP. When will this new permit be applicable to ITD construction sites?

**A3:** The EPA is currently developing the new 2008 Construction General Permit. Based on conversations with EPA, the goal is to have the Draft 2008 CGP available for public comment during the summer of 2008. Since there are multiple variables that can have a direct impact on the publication of a Final 2008 CGP, there is no set time for the release of the new CGP.

## Quiz Answers:

1. CGP Appendix G.11.
2. False. Silt fence should not be used to re-route flows. Proper application of silt fence is to filter flows to remove sediment and other pollutants.
3. Per Paragraph 29 of the Consent Decree, all storm water management files shall be maintained until one calendar year after the termination of the Decree. Therefore, since ITD cannot request termination of the Decree until after four years, at a minimum files shall be kept for 5 years.
4. False. If ITD followed proper inspection and maintenance procedures and no illicit discharge took place, the damaged fiber wattle is not a violation.